



U.S. Department of Justice

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July 31, 2023


**VIA ECF**The Honorable Gregory H. Woods  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007**Re: *United States v. Kassem Hijazi*, 21 Cr. 183 (GHW)**

Dear Judge Woods:

The Government respectfully writes in response to the Court's June 27, 2023 Order directing the Government to file its response to the forfeiture petition submitted by claimants Lucas Lima and Lima Business USA Corp (the "Claimants") on or before August 14, 2023 (the "Order"). (See ECF No. 40). That Order further directed the Claimants to file a reply by August 31, 2023, and scheduled a forfeiture hearing on October 26, 2023 at 2 PM.

The Government has conferred with the Claimants, and the parties have agreed to settle the matters raised in the Claimants' petition without the need for further briefing, or a hearing. The parties anticipate submitting a stipulation of settlement for the Court's review and endorsement on or about September 14, 2023, the date following the conclusion of the notice period alerting third parties to the Court's forfeiture order against Hijazi. Given that the parties have agreed to settle this matter, the Government respectfully requests that the Court adjourn the August 14 and August 31, 2023 briefing deadlines and the October 26, 2023 hearing *sine die*. The Claimants consent to the Government's adjournment request.

Wherefore, the Government respectfully requests that the Court so-order this letter and adjourn *sine die* all upcoming deadlines pertaining to the Claimants' forfeiture petition.


Very truly yours,  
DAMIAN WILLIAMS  
United States Attorneyby:   
Sarah Mortazavi  
Assistant United States Attorney

Cc: Peter Herrick, Esq. (via ECF)

Application granted. The deadlines pertaining to Claimants' forfeiture petition are adjourned *sine die*.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 42.

SO ORDERED.

Dated: July 31, 2023  
New York, New York  
GREGORY H. WOODS  
United States District Judge